ANNUAL 47 C.F.R. § 64.2009(e) OFFICER'S CERTIFICATION OF CUSTOMER PROPRIETARY NETWORK INFORMATION (CPNI) COMPLIANCE

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2016:	Covering calendar year 2015
Name of company(s) covered by this certification:	The City of Opelika, Alabama aka Opelika Power Services
Form 499 Filer ID:	829336
Name of signatory:	W. Craig Uptagrafft
Title of signatory:	Chief Technology Officer & Fiber Services Manager

1. I, W. Craig Uptagrafft, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. §64.2001 *et seq.*

2. Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, recordkeeping, and supervisory review) set forth in §64.2001 *et seq.* of the Commission's rules.

3. The company has not taken actions (*i.e.*, proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.

4. The company has not received customer complaints in the past year concerning the unauthorized release of CPNI.

5. The company represents and warrants that the above certification is consistent with 47 C.F.R. §1.17 which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

W. Craig Uptagrafft, Chief Technology Officer & Fiber Services Manager
The City of Opelika, Alabama aka Opelika Power Services

Date: 2-24-16

Attachments: Accompanying Statement explaining CPNI procedures
Explanation of actions taken against data brokers (not applicable, see Statement)
Summary of customer complaints (not applicable, See Statement)

Statement of CPNI Procedures and Compliance

Opelika Power Services ("Company") does not use or permit access to CPNI to market any telecommunications or non-telecommunications services. Opelika Power Services has trained its personnel not to use CPNI for marketing purposes. Should Opelika Power Services elect to use CPNI in future marketing efforts, it will follow the applicable rules set forth in 47 CFR Subpart U, including, if necessary, the institution of operational procedures to ensure that notification is provided and customer approval is obtained before CPNI is used or disclosed.

Opelika Power Services has put into place processes to safeguard its customers' CPNI from improper use or disclosure by employees; and to discover and protect against attempts by third parties to gain unauthorized access to customer CPNI.
Opelika Power Services serves business and residential customers. Annual training is performed whereby all employees with access to customer information are made aware of the confidential nature of the information and understand disclosure is not permitted.

The Company does not disclose CPNI over the telephone in response to a customer-initiated telephone inquiry. If it elects to do so in the future, it will follow the applicable rules set forth in 47 CFR Subpart U, including the implementation of authentication procedures that do not require the use of readily available biographical information or account information and customer notification of account changes.

The Company has put into place procedures to notify customers whenever a password, customer response to a back-up means of authentication for lost or forgotten passwords, online account, or address of record is created or changed without revealing the changed information or sending the notification to the new account information.

The Company has instituted authentication procedures to safeguard the disclosure of CPNI on-line. The Company's authentication procedures include the requirement of a valid email address, valid password. Unless the appropriate password is provided, the Company does not allow on-line access to CPNI.

The Company does not offer a back-up authentication method.

The Company discloses CPNI at its retail locations only if the customer has presented a valid photo ID matching his/her account information.

The Company has in place procedures to notify law enforcement in the event of a breach of customers' CPNI and to ensure that customers are not notified of the breach before the time period set forth in the FCC's rules, or, if applicable, when so authorized by law enforcement.

The Company maintains records of all breaches discovered and notifications made to the USSS and the FBI, and to customers, including the date of discovery and notification, a detailed description of the CPNI that was breached and the circumstances of the breach.

The Company has not taken any actions against data brokers in the last year.

The Company did not receive any customer complaints about the unauthorized release of CPNI or the unauthorized disclosure of CPNI in calendar year 2015.

The Company has not developed any information with respect to the processes pretexters are using to attempt to access CPNI but does take steps to protect CPNI as noted above.